CPC International Inc. P.O. Box 8000, International Plaza

P.O. Box 8000, International Plaza Englewood Cliffs, NJ 07632-9976

Legal Department

FAX: (201) 894-2193

VIA OVERNIGHT EXPRESS

Mark Benevenia Regulatory Counsel



Writer's Direct Dial: (201) 894-2614

November 14, 1995

Mr. Joseph Cosentino, OSC
Removal Action Branch
Emergency & Remedial Response Div.
U.S. Environmental Protection Agency
Region II
2890 Woodbridge Avenue
Edison, NJ 08837

Re: Bayonne Barrel & Drum Superfund Site 150-154 Raymond Blvd. Newark, NJ

Dear Mr. Cosentino:

In accordance with the September 28, 1995 Request for Information issued by the U.S. Environmental Protection Agency to CPC International Inc. (CPC) and the October 16, 1995 correspondence to you from Jim Terranova of CPC, we hereby deliver to you the Response to Request For Information and original certification.

CPC is continuing its good faith search of records to respond to the Request for Information and will supplement this submission should additional information be discovered. However, CPC again respectfully requests that EPA narrow its Request and provide us with all information in EPA's possession that identifies CPC as an arranger or generator or transporter of hazardous substances to the site. This will assist us in conducting a thorough and efficient investigation.

Please direct future communications regarding this matter to my attention.

Very truly yours

Mark Benevenia Regulatory Counsel

Attachments

cc: Marc Seidenberg, Esq. (w/attachments)

Office of Regional Counsel

U.S. Environmental Protection Agency

Region II

290 Broadway 17th fl. New York, NY 10007

BEST FOODS, A UNIT OF CPC INTERNATIONAL INC.

RESPONSE TO REQUEST FOR INFORMATION

- 1. a. Best Foods, a Unit of CPC International Inc. (hereinafter, "Best Foods")
 - b. Best Foods is a Unit of CPC International Inc., a Delaware Corporation
 - c. Charles R. Shoemate
 Chairman, President and CEO
 CPC International Inc.
 P. O.Box 8000
 Englewood Cliffs, NJ 07632

Axel C. A. Krauss
President, Best Foods
a Unit of CPC International Inc.
P. O. Box 8000
Englewood Cliffs, NJ 07632

- d. Best Foods is a unit of CPC International Inc.
- e. Best Foods is a unit of CPC International Inc.
- f. Unknown
- 2. a.
- i. Bayonne Barrel & Drum purchased from Best Foods emptied, cleaned and crushed metal containers formerly holding food grade egg product.
- ii. None identified to date.
- iii. Manufacturing of egg noodles by Best Foods since 1983; other ownership pre-1983.
- iv. Best Foods, a Unit of CPC International Inc.180 Baldwin Ave.Jersey City, NJ 07306

Current RCRA ID #NJD 980772370.

- 2. b.
- i. Unknown.
- ii. Unknown.
- iii. Crushed gold colored metal cans with lids.
- iv. Sold as scrap metal.
- v. No.
- v. (1) **N/A**
- v. (2) N/A
- vi.
- (1) Previously held food grade egg product.
 - (a) Frozen egg yolks and whole eggs.
 - (b) None.
- vii. To the best of Best Foods' knowledge, the cans were emptied, washed with hot water and crushed. Prior to the mid-1970's the cans may not have been crushed.
- ix. Robert Sych, Anthony Bernard, Arthur Jacobs, Lester Horbacz Arthur Kranich, all of Best Foods.
- x. No.
- 3. None. See response to item 7 below.
- 4. See response to item 2b(ix) above and item 7 below.
- 5. None identified to date.
- 6. None identified to date.
- 7. Mr. James Faircloth, an employee of CPC Baking Co. Inc., a wholly owned subsidiary of CPC International Inc. (930 N. Riverview Drive, Totowa, New Jersey), acting on his own accord and not on behalf of the company, allegedly collected empty 55 gallon steel drums and sold them to Bayonne Barrel & Drum. These containers formerly contained shortening oils (soybean oil, mineral oil, and lecithin) and vegalube bread pan oils (soybean oil, mineral oil, lecithin, and dimethylpolysiloxane) food grade, non-hazardous substances. This alleged activity occurred sometime during the period 1977-1985. CPC has no records regarding these alleged transactions. Information regarding these alleged transactions was provided by Stan Blodek and James Faircloth, both of Best Foods Baking Group.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of	NEW JERSEY
County of	BERGEN

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

JOHN B. MEAGHER

NAME (print or type)

CORPORATE SECRETARY

TITLE (print or type)

SIGNATURE

Sworn to me before this

14 day of November, 1995

Notary Public

Jodi L. DeMauro Notary Public of New Jersey My Commission Expires 2/7/2000

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State	of	NEW JERSEY	
			 -
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JOHN B. MEAGHER
NAME (print or type)

CORPORATE SECRETARY
TITLE (print or type)

SIGNATURE

Sworn to me before this

Aday of November, 1995

Notary Public

Jodi L. DeMauro
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES 2/7/2000